

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION (CLEVELAND)**

VIRGINIA BARNES, individually
and on behalf of all similarly
situated individuals,

Plaintiffs,

vs.

**THE PROGRESSIVE CORPORATION;
PROGRESSIVE NORTHERN
INSURANCE COMPANY; DRIVE
INSURANCE HOLDINGS, INC; and
DOES 1-10.**

Defendants.

Case No. 1:17-cv-00865

Hon. Patricia A. Gaughan

**MOTION TO ADMIT MOLLY E.
NEPHEW PRO HAC VICE**

**MOTION FOR ADMISSION OF MOLLY E. NEPHEW
PRO HAC VICE**

Pursuant to N.D. Ohio Civ. R. 83.5(h), Mark M. Abramowitz, attorney for Plaintiff, Virginia Barnes, in the above-captioned action, hereby moves the Court to admit Molly E. Nephew *pro hac vice* to appear and participate as counsel or co-counsel in this case for Plaintiff, and in support of her motion, states as follows:

1. Ms. Nephew has been a member of the bar of the State of Minnesota since October 30, 2015.
2. Ms. Nephew is and has been a member in good standing of the bar of the United States District Court, District of Colorado since June 21, 2016.
3. Ms. Nephew is and has been a member in good standing of the bar of the United States District Court, District of Minnesota since July 5, 2016.

4. Ms. Nephew is and has been a member in good standing of the bar of the United States District Court, Central District of Illinois since April 17, 2017.
5. Ms. Nephew is a member in good standing in every jurisdiction in which she is admitted to practice.
6. There are no disciplinary proceedings pending against Ms. Nephew as a member of any bar in any jurisdiction.
7. Ms. Nephew is familiar with the Local Rules of the United States District Court for the Northern District of Ohio.
8. In further support of this motion, Ms. Nephew has submitted herewith her Certificate of Good Standing. *See* Exhibit A.
9. Ms. Nephew's relevant identifying information is as follow:

Molly E. Nephew, Esq.
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WHEREFORE, the undersigned counsel respectfully moves this Court to admit Molly E.

Nephew *pro hac vice*.

DATE: May 1, 2017

Respectfully Submitted,

/s/ Mark M. Abramowitz
Mark M. Abramowitz (0088145)
Mark A. DiCello (0063924)
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Local Counsel for Plaintiff

Jacob R. Rusch (MN Bar No. 391892)*
Molly E. Nephew (MN Bar No. 397607)*

**Pro Hac Anticipated*

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